

1 NICHOLAS A. TRUTANICH
United States Attorney
2 Nevada Bar Number 13644
JARED L. GRIMMER
3 Assistant United States Attorney
District of Nevada
4 501 Las Vegas Blvd. So., Suite 1100
Las Vegas, Nevada 89101
(702) 388-6336
5 jared.l.grimmer@usdoj.gov
Attorneys for the United States

7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

9 UNITED STATES OF AMERICA,

10 Plaintiff,

11 v.

12 ERIC YOKANI MORENO-OCHOA,

13 Defendant.

Case No.: 2:18-cr-00116-JAD-CWH

**Joint Stipulation to Continue
Government's Response to
Defendant's Motion to Dismiss
(ECF No. 43) and Defendant's Reply**

(Second Request)

16 IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A.
17 Trutanich, United States Attorney, and Jared L. Grimmer, Assistant United States
18 Attorney, counsel for the United States of America, and Andrew M. Leavitt, counsel for
19 Eric Yokani Moreno-Ochoa, that the government's response to defendant's motion to
20 dismiss (ECF No. 43) currently due on Friday, July 5, 2019, be vacated and continued to
21 July 12, 2019, with defendant's corresponding reply due on July 19, 2019.

22 This Stipulation is entered into for the following reasons:

23 1. Government counsel continues to need additional time to properly respond
24 to defendant's motion, to include researching the issues raised by the defendant.

1 2. The government is currently attempting to obtain documentation which may
2 be despotive of the case.

3 3. Denial of this request for continuance could result in a miscarriage of
4 justice.

5 4. This is the second request for continuance of the government response to
6 defendant's motion to dismiss.

7
8 DATED this 5th day of July, 2019.

9
10 NICHOLAS A. TRUTANICH
11 United States Attorney

12 By /s/ Andrew M. Leavitt
13 ANDREW M. LEAVITT

12 By /s/ Jared L. Grimmer
13 JARED L. GRIMMER
14 Assistant United States Attorney

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 ERIC YOKANI MORENO-OCHOA,

7 Defendant.
8
9

Case No.: 2: 18-cr-00116-JAD-CWH

10 IT IS THEREFORE ORDERED that the government's response to defendant's
11 motion to dismiss (ECF No. 43) currently due on Friday, July 5, 2019, be vacated and
12 continued to July 12, 2019, with defendant's corresponding reply due on July 19, 2019.

13 DATED this 10 day of July, 2019.

14
15 
16 UNITED STATES MAGISTRATE JUDGE
17
18
19
20
21
22
23
24